

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: EQUIFAX, INC. CUSTOMER DATA
SECURITY BREACH LITIGATION.

CONSUMER ACTIONS

MDL Docket No. 2800
No.: 1:17-md-2800-TWT

Jury Trial Demanded

**EXHIBIT D TO
APPLICATION OF RICHARD M. HAGSTROM AND HELLMUTH &
JOHNSON, PLLC FOR APPOINTMENT TO THE
CONSUMER PLAINTIFFS' STEERING COMMITTEE**

STATE OF MINNESOTA
FOURTH JUDICIAL DISTRICT COURT



BRUCE A. PETERSON
JUDGE
HENNEPIN COUNTY GOVERNMENT CENTER
MINNEAPOLIS, MINNESOTA 55487-0422
(612) 596-7126
FAX (612) 596-9128

November 9, 2017

VIA EMAIL AND USPS

The Honorable Charles R. Breyer
United States District Court
Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102

**Re: In re German Automotive Manufacturers Antitrust Litigation
Case No. 3:17-MD-02796**

Dear Judge Breyer:

I am informed that Richard Hagstrom from Minneapolis, Minnesota has asked to be included on the Plaintiffs Steering Committee in the above-referenced action. I have received a copy of your Pretrial Order No. 1, dated October 17, 2017. I note that in your Pretrial Order No. 1 you request the names and contact information of judges before whom the applicant has appeared.

I was first introduced to Mr. Hagstrom in the *Microsoft* class-action litigation that he filed against Microsoft on behalf of a class of Minnesota indirect purchasers. I presided over the case. Sharon Nelles and David Tulchin of Sullivan and Cromwell were the lead attorneys for Microsoft. I appointed Mr. Hagstrom as lead counsel for the plaintiffs, and certified the class, making the case the first antitrust indirect purchaser class action to ever be certified in Minnesota and the first such case to go to trial. It was truly one of a kind.

Counsel on both sides were extremely professional, well prepared, and worked tirelessly. Mr. Hagstrom, as lead counsel, was always congenial but confidently assertive in his positions. Mr. Hagstrom led the team and did a superb job.

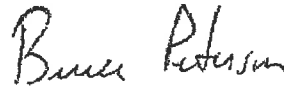
While I pressed the parties to try to mediate prior to trial, I know Mr. Hagstrom and his team pushed forward because they were not satisfied that their clients, the Minnesota class members, would be compensated well enough with a pretrial settlement. After seven weeks of trial, the case settled at one of the highest per-capita settlements of all of the *Microsoft* cases. From what I have observed, Mr. Hagstrom always puts the interests of his clients first.

Additionally, Mr. Hagstrom is deeply committed to *pro bono* work. He has held all officer positions, including chair, of the Fund for Legal Aid, which raises over \$1 million per year for Mid-Minnesota Legal Aid.

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If you choose to appoint Mr. Hagstrom to the Plaintiffs Steering Committee, I am confident that you will be as favorably impressed as I have been with Mr. Hagstrom's passion for and knowledge of the law, oral skills, and zealous advocacy.

My Best Regards,

A handwritten signature in black ink that reads "Bruce Peterson". The signature is written in a cursive, slightly slanted style.

Bruce A. Peterson
Fourth Judicial District, State of Minnesota

THE DISTRICT COURT OF IOWA

Fifth Judicial District
Polk County Courthouse
Des Moines, Iowa 50309-4238

Telephone 515-286-3463
Facsimile 515-286-3858

Scott D. Rosenberg
District Court Judge

November 17, 2017

The Honorable Charles R. Breyer
United States District Court Judge
Northern District of California

Re: Steering Committee- German Automotive Manufacturers Antitrust Litigation

Dear Judge Breyer,

I am writing on behalf of attorneys Roxanne Conlin and Richard Hagstrom who are seeking to be members of the steering committee in the above matter. These two attorneys were the lead counsel in the case of Comes v. Microsoft, a class action suit filed in the State of Iowa. Over several years these extremely competent and professional attorneys led a mini-army of attorneys, parties and witnesses in this massive and complex litigation.

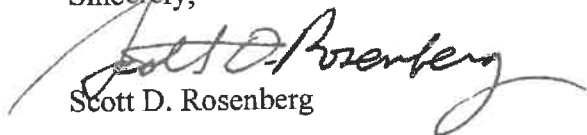
The suit was an anti-trust action that went up to our Iowa Supreme Court at least two times on interlocutory appeal. I handled numerous motions in this matter over years and also presided over the trial. The trial went on for three months before the parties reached a settlement of over \$179,000,000.00.

The professionalism, courtesy, adeptness and competency of Ms. Conlin and Mr. Hagstrom never varied during the entire time I observed them in court. They were pitted against numerous and some of the best defense counsel in the United States. The attorneys came from New York, Washington, D.C., San Francisco and Minneapolis. Ms. Conlin and Mr. Hagstrom did an outstanding job and kept their case organized and flowing. They also handled millions of pieces of evidence with no problem.

I believe that Ms. Conlin and Mr. Hagstrom are more than capable to handle, in any, capacity the most complex and massive litigation that comes their way.

If I can be of further assistance to you please don't hesitate to contact me at your convenience. Thank you very much.

Sincerely,



Scott D. Rosenberg